

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ELAINE MITTLEMAN EM/USPS-15—17, 19 and 27
(June 29, 2012)**

The United States Postal Service files this objection to the above-identified interrogatories filed on June 22, 2012. The objectionable interrogatories are stated verbatim and followed by a statement of the basis for the objection. The first objection below applies to EM/USPS-15—17 and 19. The second objection applies to EM/USPS-27.

EM/USPS-15. What procedure does the Postal Service use to review cases that have been remanded by the Postal Regulatory Commission?

EM/USPS-16. Are there appeal rights available after a remand by the Postal Regulatory Commission?

EM/USPS-17. Does the Postal Service consider a remand order of the Postal Regulatory Commission to be binding or does it consider a remand order to be an advisory opinion?

EM/USPS-19. What was the cost to the Postal Service of the closing process and RAOI, including community meetings and appeals, which was abandoned when the present proposal to reduce hours was adopted?

The Postal Service objects to the above mentioned interrogatories because they seek information not relevant to POSTPlan. Instead, they seek information about the procedures and processes for closing Post Offices that are not part of POSTPlan. While these questions may be relevant to the Retail Access Optimization Initiative (RAOI)

proceeding, they have no relevance to this request. POSTPlan was designed to realign window service hours to match customer use of postal services. As stated on page 17 of the Direct Testimony of Witness Day (USPS-T-1), "consideration of a Post Office for realignment of retail window hours occurs separate and independent of the discontinuance process in USPS Handbook PO-101."

The Postal Service also objects to EM/USPS-27:

EM/USPS-27. What is the operating loss of the Postal Service for the last two fiscal years? Does this loss include payments for retirement and health-care benefits? If so, what is the loss without including payments for retirement and health-care benefits?

The Postal Service objects to this interrogatory because it is also not relevant to the POSTPlan request. The operational loss of the Postal Service for the last two years as it relates to retirement and health-care benefits has no bearing on POSTPlan or the Postal Service's adherence to statutory obligations prior to the implementation of POSTPlan.

Thus, the information sought by the above mentioned interrogatories would not further inform the Commission's opinion in this docket regarding the applicable service policies of title 39. Accordingly, the Postal Service objects to the above mentioned interrogatories EM/USPS-15-17, 19, and 27.

Respectfully submitted,

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